

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:

EX PARTE APPLICATION OF  
GULF INVESTMENT CORPORATION FOR  
AN ORDER TO OBTAIN DISCOVERY FOR  
USE IN FOREIGN PROCEEDINGS  
PURSUANT TO 28 U.S.C. §1782

Case No. \_\_\_\_\_

**EX PARTE APPLICATION OF GULF INVESTMENT CORPORATION FOR AN  
ORDER TO CONDUCT DISCOVERY FOR USE IN FOREIGN PROCEEDINGS  
PURSUANT TO 28 U.S.C. § 1782**

Gulf Investment Corporation (“GIC”), pursuant to 28 U.S.C. § 1782 and Federal Rules of Civil Procedure 26, 34, and 45, respectfully requests that this court grant an *ex parte* order in the form attached as **Exhibit Y** to the declaration of Kristin N. Tahler (“**Tahler Declaration**”) authorizing GIC to obtain certain limited discovery<sup>1</sup> for use in a contemplated litigation in the Cayman Islands. In support of this Application, GIC submits a Memorandum of Law and attaches the sworn declarations with accompanying exhibits of (1) Kristin Tahler; (2) Anna Peccarino; and (3) Nicholas Bortman.

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<sup>1</sup> See Tahler Declaration, attached hereto as Appendix A, at Exhibits M-X (Draft Subpoenas).

Dated: December 26, 2019

Respectfully submitted,

/s/ Marc P. Hedrich

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